

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

VICTOR MANUEL RIBAS,)
Plaintiff,)
v.) Case No. 4:24-cv-00632
MEGAN BESLER,)
Defendant.)

**DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION TO ENFORCE
SETTLEMENT**

COMES NOW Defendant, by and through undersigned counsel, and for her response to Plaintiff's Motion to Enforce states as follows: Defense counsel conferred with Plaintiff's counsel yesterday. It is now Defendant's understanding that the only substantive remaining issue is the liquidated damages provision, along with smoothing out some of the language proposed in other provisions of the draft Settlement Agreement. Therefore, Defendant **consents** to conferring with Judge Prebil to attempt to resolve this ongoing dispute. Defendant is hopeful that after the Parties meet with Judge Prebil, a mutually agreeable settlement agreement can be signed by the Parties and the case will be dismissed with prejudice. However, Defendant notes that given past difficulties between the Parties, including the complicated nature of some of the provisions in the proposed Settlement Agreement, it is possible that the Parties could be back before this Court in the future on this matter. Nonetheless, Defense counsel and Plaintiff's counsel remain optimistic that a mutually agreeable resolution will be finally reached with Judge Prebil.

Dated: February 26, 2025

Respectfully submitted,

KEANE LAW LLC

By: /s/ Ryan A. Keane
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CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the attorneys of record.

/s/ Ryan A. Keane